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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON, EUGENE DIVISION**

NICOLE GILLILLAND, an individual,

Plaintiff,

vs.

SOUTHWESTERN OREGON COMMUNITY COLLEGE DISTRICT by and through its BOARD OF EDUCATION, an Oregon community college District and Board; SOUTHWESTERN OREGON COMMUNITY COLLEGE, an Oregon community college; TIM DAILEY, an individual; SUSAN WALKER, an individual; MELISSA SPERRY, an individual and,

Defendants.

Case No. 6:19-cv-00283-MK

DECLARATION OF NICOLE GILLILLAND IN SUPPORT OF REPLY FOR MOTION FOR SPOILATION SANCTIONS

I, Nicole Gililand, declare as follows:

1. I have personal knowledge of the facts set forth below, and I am over the age of eighteen.
2. I am the Plaintiff in this matter.

3. Defendants imply in their Opposition to the Motion for Spoliation Sanctions that nursing students in the program did not regularly submit through Southwestern Oregon Community College's (SWOCC) Learning Management System (LMS), which was known as MyLakerLink.

4. On the contrary, nursing students, including myself, were regularly and routinely required to submit our completed assignments using MyLakerLink throughout 2018.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 26th day of August 2021.

/s/ Nicole Gililand (Electronically signed with email
permission)
Nicole Gililand

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of August 2021, I caused to be filed a true and correct copy of the foregoing **DECLARATION OF NICOLE GILLAND IN SUPPORT OF REPLY FOR MOTION FOR SPOILATION SANCTIONS** with the Court's ECF system, which sent notice of such filing to counsel for all parties hereto.

DATED: August 27, 2021.

/s/ Brandon J. Mark